

**UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
MIDLAND/ODESSA DIVISION**

VIRTAMOVE, CORP.,

Plaintiff,

v.

GOOGLE LLC,

Defendant.

Case No. 7:24-cv-00033-DC-DTG

JURY TRIAL DEMANDED

NOTICE OF VENUE DISCOVERY

Pursuant to Section III of the Court’s Standing Order Governing Patent Proceedings, Plaintiff VirtaMove Corp. (“VirtaMove”) hereby provides notice that it will serve venue discovery requests upon Defendant Google LLC’s (“Defendant” or “Google”), and that this venue discovery will delay its response to Google’s pending Motion to Transfer (ECF No. 44). Google filed its Motion to Transfer on July 10, 2024 as Dkt. 44, and on July 11, 2024, Google filed Declaration of Deepa Acharya in support of its Motion to Transfer with 48 exhibits as Dkt. 45. On July 11, 2024¹ Google served a copy of Motion to Transfer. Under OGP § III, the venue discovery period runs for 10 weeks from July 11, 2024 through September 19, 2024, and the deadline for VirtaMove to respond to the transfer motion is thus delayed to October 3, 2024.

Dated: July 15, 2024

Respectfully submitted,

¹ Plaintiff reserves all rights in view of the Court’s July 2, 2024 text order setting a July 10, 2024 deadline.

By: Qi (Peter) Tong

Reza Mirzaie (CA SBN 246953)
rmirzaie@raklaw.com
Marc A. Fenster (CA SBN 181067)
mfenster@raklaw.com
Neil A. Rubin (CA SBN 250761)
nrubin@raklaw.com
James A. Milkey (CA SBN 281283)
jmilkey@raklaw.com
Amy E. Hayden (CA SBN 287026)
ahayden@raklaw.com
Jacob Buczko (CA SBN 269408)
jbuczko@raklaw.com
James Tsuei (CA SBN 285530)
jtsuei@raklaw.com
Christian W. Conkle (CA SBN 306374)
cconkle@raklaw.com
Jonathan Ma (CA SBN 312773)
jma@raklaw.com
Daniel B. Kolko (CA SBN 341680)
dkolko@raklaw.com
RUSS AUGUST & KABAT
12424 Wilshire Boulevard, 12th Floor
Los Angeles, CA 90025
Telephone: (310) 826-7474

Qi (Peter) Tong (TX SBN 24119042)
RUSS AUGUST & KABAT
4925 Greenville Ave., Suite 200
Dallas, TX 75206
Telephone: (310) 826-7474

Attorneys for Plaintiff VirtaMove, Corp.

CERTIFICATE OF SERVICE

I certify that on July 15, 2024, a true and correct copy of the foregoing document was electronically filed with the Court and served on all parties of record via the Court's CM/ECF system.

/s/ Qi (Peter) Tong
Qi (Peter) Tong